



Epstein Drangel LLP

60 East 42nd Street, Suite 2520, New York, NY 10165

T: 212.292.5390 • E: mail@ipcounselors.com

www.ipcounselors.com

February 17, 2022

**VIA ECF**

Hon. Paul G. Gardephe  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *Allstar Marketing Group, LLC v. Ali Dropshipping Support Store, et al.***  
**Case No. 21-cv-333**  
**Request For Extension of Time to Respond to Court's February 14, 2022 Order**

Dear Judge Gardephe,

We represent Plaintiff Allstar Marketing Group, LLC ("Plaintiff"), in the above-referenced matter (the "Action").<sup>1</sup> On February 14, 2022, the Court entered an Order directing Plaintiff to show cause as to why Plaintiff's claims against the remaining Defaulting Defendants should not be dismissed for lack of personal jurisdiction by February 17, 2022 ("February 14, 2022 Order") (Dkt. 41). For the reasons set forth herein, Plaintiff respectfully requests a one (1) week extension of time to file a written submission in response to the February 14, 2022 Order. This is Plaintiff's first request for an extension of time to file a written response to the Court's February 14, 2022 Order.

Due to Defaulting Defendants' failures to appear in this Action, Plaintiff is unfortunately unable to establish whether each of the forty-five (45) remaining Defaulting Defendants have completed and shipped sales of Counterfeit Products to consumers in New York. However, after the February 10, 2022 hearing, Plaintiff discovered that one of the Defaulting Defendants is currently selling Counterfeit Products on the Alibaba platform in direct violation of both the TRO and PI Order entered in this Action. Epstein Drangel is in the process of making a test purchase from this Defaulting Defendant, however, making a purchase from a merchant on the Alibaba requires messaging the merchant through Alibaba's messaging system and requesting an order confirmation prior to issuing payment. On February 11, 2022 Epstein Drangel requested to purchase a Counterfeit Product from this Defaulting Defendant and is currently awaiting the issuance of an order confirmation. Epstein Drangel provided the Defaulting Defendant with the New York Address, and the Defaulting Defendant did not object to shipping the Counterfeit Product to the New York Address. Accordingly, Plaintiff respectfully requests an extension of time to file its written submission, until February 24, 2022, to allow Epstein Drangel additional time to complete the purchase of a Counterfeit Product to establish that this Court has personal jurisdiction over this Defaulting Defendant.

---

<sup>1</sup> Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff's Complaint or Application.

Hon. Paul G. Gardephe  
February 17, 2022  
Page 2

We thank the Court for its time and attention to this matter.

Respectfully submitted,

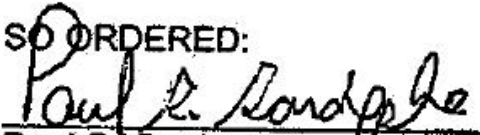
**EPSTEIN DRANGEL LLP**

BY: /s/Karena K. Ioannou  
Karena K. Ioannou  
kioannou@ipcounselors.com  
60 East 42nd Street, Suite 2520  
New York, NY 10165  
Telephone: (212) 292-5390  
Facsimile: (212) 292-5391  
*Attorneys for Plaintiff*

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** February 21, 2022